

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Pasz Auf Film, Inc.,

Docket No. 07 Civ. 7021 (PKL)

Plaintiff,

v.

ANSWER TO AMENDED COMPLAINT

Manuel Parrish,

Defendant.

The defendant, Manuel Parrish, by his attorney, Ravi Ivan Sharma, answers plaintiff's amended complaint as follows:

DENIALS

1. Defendant denies each and every allegation contained in paragraphs 3, 14, 19, 21, 22, 24, 25, 27, 28, 30, 31, 32, 35, and 36 of the complaint.

DENIALS BASED ON LACK OF INFORMATION

2. Defendant lacks sufficient information to form a belief, the paragraphs assert multiple claims, are unintelligible, or require expert conclusions of law to properly answer; therefore defendant denies the allegations contained in paragraphs 1, 4, 5, 6, 7, 8, 12, 13, 16, 17, 18, 20, 23, 26, 29, 33, and 34 of the complaint.

ADMISSIONS

3. Defendant admits the allegations contained in paragraphs 2, 9, 10, 11, and 15 of the complaint.

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2. Defendant lacks sufficient information to form a belief, the paragraphs assert multiple claims, are unintelligible, or require expert conclusions of law to properly answer; therefore defendant denies the allegations contained in paragraphs 1, 4, 5, 6, 7, 8, 12, 13, 16, 17, 18, 20, 23, 26, 29, 33, and 34 of the complaint.

ADMISSIONS

3. Defendant admits the allegations contained in paragraphs 2, 9, 10, 11, and 15 of the complaint.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

4. The Complaint fails to state a cause of action.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

3. There is no subject matter jurisdiction of this action by this court. The amount in controversy is not greater than \$75,000.00.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

5. The action and, or recovery are barred by the doctrine of laches.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

6. The action and, or recovery is barred by the statute of limitations.

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE

7. The action and, or recovery is barred by the doctrine of waiver.

AS AND FOR A SIXTH AFFIRMATIVE DEFENSE

8. The action and, or recovery is barred by the doctrine of estoppel.

AS AND FOR A SEVENTH AFFIRMATIVE DEFENSE

4. The defendant was not properly served.